



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via Electronic Mail and US Postal Service

February 25, 2014

Mr. Daniel Tisoncik
Management Director of Environmental Affairs - Liability
United Airlines, Inc.
233 S. Wacker Drive – 28th Floor
Chicago, Illinois 60606

Re: USEPA Phase I Approval of the Cleanup Completion Report, Buildings 10 and 15, United Airlines San Francisco Maintenance Center, San Francisco International Airport

Dear Mr. Tisoncik:

Thank you for your submission of the *Cleanup Completion Report, Buildings 10 and 15*, dated February 6, 2014 (Cleanup Completion Report for Buildings 10 and 15), prepared by Environmental Resources Management (ERM) on behalf of United Airlines, Inc. (UA), summarizing polychlorinated biphenyl (PCB) characterization and remediation work that has been conducted at the UA San Francisco Maintenance Center at the San Francisco International Airport (SFO), San Francisco, California (Site).

The U.S. Environmental Protection Agency (USEPA) hereby finds that the Cleanup Completion Report for Buildings 10 and 15 demonstrates that cleanup requirements for PCBs for Phase I of the cleanup were met, with a few exceptions described in the next paragraph below. Cleanup requirements were met at the Site for the following areas:

- Industrial waste lines and drains in Buildings 10 and 15;
- Dust in all areas of Building 10, with the exception of the paint shop and recycling storage bin area; and
- Dust in all areas of Building 15.

The Cleanup Completion Report for Buildings 10 and 15 indicates that additional remediation work is required in certain areas of Building 10, based on PCB analytical data obtained during this investigation. UA will prepare a (1) Workplan for Phase II Dust Investigation to address PCB concentrations detected above the risk-based screening level (RBSL) in dust in localized areas of Building 10 (the paint shop and recycling storage bin area); and (2) a separate letter request to mitigate PCB RBSL exceedances in the floor-level utility ports located in Building 10. Prior to preparation of the Workplan for Phase II Dust Investigation and closure request of the inactive utility ports, and outside of this approval letter, USEPA would like to discuss with UA the logistics of this supplemental work. In addition to UA's plan to conduct further investigation in Building 10, there are other areas within the Site (e.g., the outdoor stormwater containment basin) that are beyond the scope of this Approval and part of a subsequent phase of this project, that UA will need to address under a separate cover. USEPA considers the outdoor area to be a priority for PCB investigation, as the potential presence of PCBs in this area may contribute to PCB impacts to the San Francisco Bay. Therefore, we anticipate that the next phase following completion of the Building 10 follow-up investigation, will involve the outdoor areas.

UA and ERM completed the PCB related work consistent with USEPA's April 17, 2013 conditional approval (Original Approval) of the *Revised Workplan for PCB Investigation, Risk-Based Screening, and Remedial Action for Buildings 10 and 15*, dated February 28, 2013 (Revised Workplan). The Revised Workplan is UA's risk-based disposal approval application (Original Application) for PCBs required under 40 CFR 761.61(c). UA has complied with the conditions of approval in USEPA's Original Approval and requests from USEPA in subsequent discussions and email records. USEPA's determination is based on the "USEPA Approval Terms and Conditions" provided below.

USEPA Approval Terms and Conditions of the PCB Cleanup Completion Report, Buildings 10 and 15:

1. **Effluent Monitoring.** Results of the rinsate samples collected in the industrial waste lines in Building 15 indicated that three out of ten rinsate samples were detected above the RBSL. USEPA accepts UA and ERM's discussion of these exceedances in the Cleanup Completion Report for Buildings 10 and 15. The discussion indicates that the RBSL established for the rinsate sample is based on a conservative scenario that did not take into account any treatment processes (e.g., treatment at the metals removal plant [MRP], SFO's wastewater treatment plant, and San Francisco's municipal wastewater treatment system). Secondly, PCB concentrations were detected at very low concentrations, slightly above the RBSL. Finally, PCBs in the industrial waste lines do not appear to be migrating off-site based on seven influent samples collected from the MRP in 2013. We are pleased that the rinsate results demonstrated the effectiveness of the industrial waste line remediation activities, and that preventative measures are in-place to help avoid discharge of PCBs to San Francisco Bay. However, to confirm the absence of PCBs in the industrial waste lines, and to further demonstrate the effectiveness of the MRP, USEPA is requesting that UA conduct annual sampling of the MRP effluent for PCB analysis for a period of 3 years, following issuance of this Approval.
2. **Additional Characterization.** USEPA has determined that UA has complied with the conditions in USEPA's Original Approval and applicable regulatory requirements in 40 CFR 761, with the exception of a few areas within Building 10 to be addressed under separate cover, and additional annual PCB monitoring in the MRP effluent. This Phase I Approval hereby finds the following areas have met the requirements for PCBs: industrial waste lines and drains in Buildings 10 and 15; dust in all areas of Building 10, except for the dust in the paint shop and recycling storage bin area; all other areas of Building 10 except PCBs detected in association with the utility ports in Building 10; and dust in all areas of Building 15. UA has proposed to prepare an additional workplan and letter request under separate covers to address PCBs detected above the RBSLs in the dust in the paint shop and recycling storage bin area of Building 10, and in the soil/debris in utility ports in Building 10, respectively. Buildings 10 and 15, which are located within the 116-acre Site, are part of the initial phase of characterization and cleanup. All other areas of the Site will be evaluated as part of separate phases of the project. For organization purposes, UA shall provide separate submittals to address other areas of concern.
3. **Limitations.** USEPA approved the RBSLs established for the Site. The RBSLs are based on site-specific risk assessments. The approved PCB RBSLs are protective of industrial and construction worker exposure scenarios evaluated for receptors in proximity to the Site, and also take into consideration potential discharges to the San Francisco Bay (industrial waste lines only). Consistent with the above review, USEPA concludes that for this initial cleanup phase, no further cleanup of PCBs is necessary for the following areas: (1) the industrial waste lines and

Daniel Tisoncik

Re: USEPA Approval – Cleanup Completion Report, Buildings 10 and 15

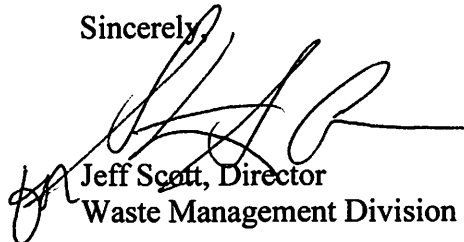
Date: February 25, 2014

drains in Buildings 10 and 15 (however, USEPA requests additional annual MRP effluent monitoring for a period of 3 years as a precautionary measure); (2) dust in Building 10, aside from the paint shop and recycling storage bin area; and (3) dust in all areas of Building 15. However, USEPA may require additional investigation and cleanup of PCBs if a finding is made after the date of this letter that PCBs remain at the Site at concentrations above the RBSL and/or land use is changed to unrestricted use. Buildings 10 and 15, which were the subject of this investigation and remediation under TSCA, encompass approximately 8 acres within the 116-acre Site.

This Approval does not relieve the property owner or UA from complying with all applicable federal, state, and local regulations and permits, nor does it exempt or waive any requirement to obtain additional cleanup orders, approvals or permits pursuant to other regulatory programs, where warranted. UA is also under a continuing obligation to comply with all requirements of TSCA regardless of whether or not such requirements are contained within this Approval. Nothing in this Approval limits USEPA's ability to seek penalties or pursue other legal action, including compliance orders or criminal proceedings, for violations of the terms or conditions of this Approval or of applicable federal, state or local law (including other TSCA PCB requirements).

USEPA appreciates UA and ERM's implementation and completion of the PCB cleanup in Buildings 10 and 15 of the Site. USEPA looks forward to meeting with UA and ERM to discuss the supplemental work involving remediation of PCBs in dust and mitigation of PCBs detected in the utility ports in Building 10, as well as the next phase of the project. If you have any questions concerning this Approval, please contact Cynthia Ruelas at (415) 972-3329. Thank you for your cooperation.

Sincerely,



Jeff Scott, Director
Waste Management Division

Electronic cc w/enclosure: Gladston Taylor, UA
Terri Herson, ER